

15

January 26, 2015

Hand Delivery

Clerk of Court

The United States District Court

For The Eastern District of Michigan

Southern Division

U.S. Courthouse

231 W. Lafayette Blvd.

Detroit, Michigan 48226

FILED
2015 JAN 26 A 10:15
U.S. DIST. COURT CLERK
EAST DIST. MICH.
DETROIT

Courtroom of Judge Denise Page Hood

Case No. 2:10-cv-14360-DPH- MKM

The Shane Group, Inc. etc. al

Supplement to Objection

Supplement to Sanction Motion

Plaintiffs,

v. Blue Cross Blue Shield of Michigan.

Defendant,

The attached Exhibit “D” the fee petition of Kohn Swift and “D1” the fee petition of Cohen Milstein were inadvertently left out of the filing made by the objector on January 22, 2015 and are hereby incorporated into that document. The two documents show evidence of “lawyer swapping” that appears to show nefarious motives in their fee filings that artificially drive up the fees to the class.

Exhibit “I”, the firm of Sommers Schwartz has a fee issue with one lawyer referenced in a previous filing made by the objector but objector believed that the law firm was in the clear on “ghost promotion” and “ghost attorneys” issues but that now seem false. The firm appears to have billed out an attorney by the name of Lisa Mikalonis as a “Partner”. This attorney was billed out at a rate of \$530.00 per hour for 36 hours for a cost to the class of \$19,000.00 yet **no** records can be found on the internet to show that she was indeed a made “partner”. Partner papers, buy-in amount etc. now need to be verified.

The total number of law firms that appear to have “ghost promotion” “ghost attorneys” and “lawyer swapping” issues which artificially and unfairly increases the fees to the class now numbers twelve of eighteen law firms or 66.6% which includes all of class counsel. The total fraud in the ghost schemes is approximately \$1,200,000.00.

After careful consideration the Court should not have a “CTJM meeting” with all applicable firms as referenced at the end of the filing made on January 22, 2015 but rather a “CPC meeting” is in order, (Career Path Change) which means it is the last day of employment for all applicable firms. Second chances are not applicable any more based on all the evidence uncovered and counsels attack on the objector to attempt to hide their fraudulent acts by diverting the objector’s attention away from their fraud by creating unnecessary work by filing wasteful and overly expansive documents that the objector has to read through and respond to. These firms should not be simply given double secret probation for what they have done but banished from the case.

Strong possibility of “ghost promotion” by Sommers Schwartz.

Lisa Mikalonis

Attorney at Rader, Fishman & Grauer PLLC

Greater Detroit Area

Law Practice

Previous

1. Sommers Schwartz PC,
2. MotorCity Casino,

3. Wayne State University Law School

Education

1. University of Oregon School of Law

Recommendations 1 person has recommended **Lisa**

Websites

- Company Website

321connections

Join LinkedIn & access Lisa's full profile. It's free!

As a LinkedIn member, you'll join 300 million other professionals who are sharing connections, ideas, and opportunities.

- See who you know in common
- Get introduced
- Contact Lisa directly

View Lisa's Full Profile

Background

Summary

Specialties: Commercial litigation, intellectual property litigation, media law, libel, privacy, copyright, trademark, unfair trade practices, communications law.

advertising, and entertainment law

Negotiation and drafting agreements, including vendor purchasing agreements, software licenses, subscription agreements, sponsorship agreements, location agreements service agreements, maintenance and support agreements, confidentiality agreements and gaming agreements.

Experience

RADER

FISHMAN

GRAUER

Attorney

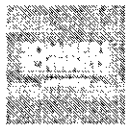
Rader, Fishman & Grauer PLLC

January 2014 – Present (1 year 1 month) Bloomfield Hills, MI

- Engaged in all aspects of intellectual property litigation on copyright, trademark and patent cases.
- Negotiated and drafted software licenses and other intellectual property licenses, including cloud computing and software as services agreements.
- Negotiated and drafted services, subscription, maintenance and support, advertising, marketing, sponsorship, location, confidentiality and gaming

agreements.

- Advised clients regarding online and electronic media laws and regulations and drafted privacy policies and terms of use.
- Represented and advised clients in matters involving media law, libel, privacy, unfair trade practices, communications law, advertising, and entertainment law.



Attorney

Sommers Schwartz PC

September 2007 – January 2014 (6 years 5 months) Southfield, MI

- Performed intellectual property litigation and complex commercial litigation.
- Negotiated and drafted license, services, subscription, maintenance and support, advertising, marketing, sponsorship, location, confidentiality and gaming agreements.
- Represented and advised clients in media law, libel, privacy, unfair trade practices, communications law, advertising, and entertainment law.

Assistant General Counsel

MotorCity Casino

2005 – 2007 (2 years) Detroit, MI

- Negotiated and drafted vendor purchasing agreements, software licenses, confidentiality agreements, sponsorship agreements, advertising agreements and service and maintenance agreements.
- Reviewed agreements, marketing and promotional materials for regulatory compliance.
- Advised client in entertainment law, marketing, advertising, intellectual property, gaming and liquor control issues.
- Managed client's intellectual property portfolio.
- Supervised outside counsel on collections and intellectual property matters.

Assistant Dean for Career Services

Wayne State University Law School

2004 – 2005 (1 year) Detroit, MI

- Managed Career Services Office.
- Counseled students and alumni, and developed and administered programming and events.

- Engaged in outreach with employers.
- Published career search materials, updated website, maintained databases.

Legal Writing Lecturer, Adjunct Professor of Law - Mass Media Law

Wayne State University Law School

1992 – 2005 (13 years)

Adjunct Lecturer in Press Law and Ethics

University of Michigan, Dearborn

January 2001 -- May 2001 (5 months) Dearborn, MI

Attorney

Law Offices of Dawn Phillips Hertz

1993 – 2001 (8 years) Oakland County, MI

- Represented print and broadcast media, internet providers, software manufacturers, publishers, and authors in First Amendment and intellectual property law including media law, libel, privacy, copyright, trademark, unfair trade practices, communications law, freedom of information and open meetings acts, protection of sources, rights of access, antitrust, and advertising.

- Conducted prepublication review and computer monitoring.
- Provided Legal Hotline to members of the Michigan Press Association.

D_W

Attorney

Dickinson Wright PLLC

1988 – 1991 (3 years) Bloomfield Hills, MI

Performed commercial litigation and appeals including general civil matters, insurance defense, commercial real estate, libel, privacy, media law, trademark, copyright, general negligence, employment and bankruptcy.

Attorney

Fisher, Wayland, Cooper & Leader

1986 – 1988 (2 years) Washington, DC

- Performed communications law including administrative litigation, broadcast property sales and acquisitions, regulatory matters, and appeals.
- Represented clients in intellectual property matters and media law.

https://m.facebook.com/SommersSchwartzPC?v=timeline&filter=0&timecutoff=1391636750§ionLoadingID=m_timeline_loading_div_1388563199_1357027200_8_&timeend=1388563199×tart=1357027200&tm=AQck3JcZ5eFk9H2Q

Sommers Schwartz, PC shared a link.

Dec 10, 2013 ·

Thank you for your continued time and patience in this soon to be historical case.

Respectfully submitted,

Christopher Andrews

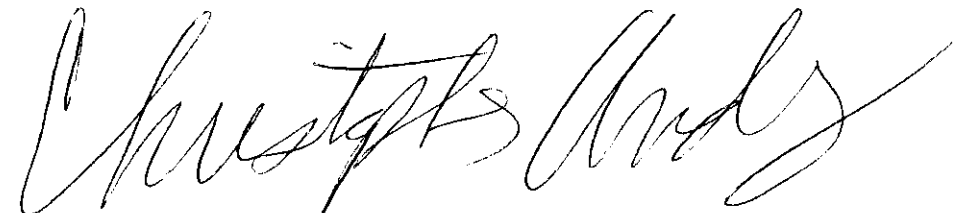
Case No. Case No. 2:10-cv-14360-DPH-MKM

Dated: January 26, 2015

Christopher Andrews, Pro se objector

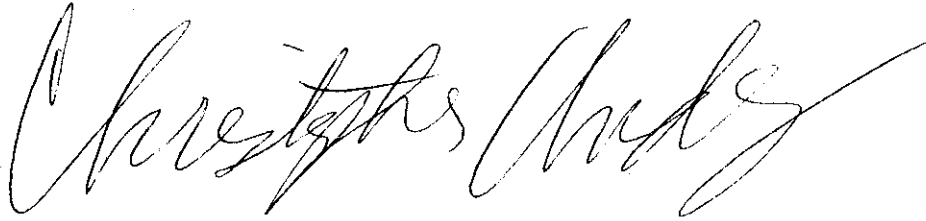
P.O. Box 530394

Livonia, MI 48152-0394 E-mail caalooa@gmail.com Phone 1-248-635-3810



Christopher Andrews

I certify under penalty of perjury that the above and below information is true and accurate to the best of my knowledge, information and belief.

A handwritten signature in black ink, appearing to read "Christopher Andrews". The signature is fluid and cursive, with a large initial "C" and a long, sweeping underline.

Christopher Andrews

I hereby certify that on this day I hand delivered the foregoing to the Clerk of the Court, and served true and correct copies upon class counsel via email (per their permission) at the email addresses below. Clerk of Court, the United States District Court for the Eastern District of Michigan Southern Division, U.S. Courthouse 231 W. Lafayette Blvd. Detroit, Michigan 48226 Telephone number (313) 234-5005.

COHEN MILSTEIN SELLERS & TOLL PLLC 202-408-4600 Daniel A. Small
Daniel Small <dsmall@cohenmilstein.com>,

Brent W. Johnson

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Suite 500

Washington, DC 20005

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Canadian Pacific Plaza

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Minneapolis, MN 55402

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dhedlund@gustafsongluek.com,

The Miller Law Firm

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Attention Mr. Miller E. Powell Miller" <epm@millerlawpc.com>

Wolf Haldenstein Adler Freeman & Herz, LLC

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New York, New York 10016

Attention Fred Isquith isquith@whafh.com

Fink & Associates Law

100 West Long Lake Road, Suite 111

Bloomfield Hills, MI 48304

Attention D. Fink dfink@finkandassociateslaw.com The Shane Group etc. al v

Blue Cross Blue Shield of Michigan Case No. 2:10-cv-14360-DPH-MKM

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dettinger@honigman.com, rphillips@bcbsm.com,

jthompson@sommerspc.com Attorneys for Atena Inc. jlipton@gibson.com

EXHIBIT "D"

THE SHANE GROUP, INC., et al., v. BLUE CROSS BLUE SHIELD OF MICHIGAN
Case No. 10-cv-14360
Time and Lodestar Summary

THE SHANE GROUP, INC., et
al., v. BLUE CROSS BLUE
SHIELD OF MICHIGAN
Case No. 10-cv-14360
Time and Lodestar Summary

Firm Name	KOHN, SWIFT & GRAF, P.C.
Time Period	Inception through June 30, 2014

Name	Status	Hourly Rate	Total Hours	Total Lodestar
DOUGLAS A. ABRAHAMS	(SH)	\$ 635.00	0.50	\$ 317.50
WILLIAM E. HOESE	(SH)	\$ 635.00	35.80	\$ 22,733.00
CRAIG W. HILLWIG	(SH)	\$ 550.00	254.80	\$ 140,140.00
DAVID BENNER	(A)	\$ 350.00	264.75	\$ 92,662.50
IAN OSSAKOW	(A)	\$ 350.00	230.75	\$ 80,762.50
LINDSAY OAK	(A)	\$ 350.00	285.25	\$ 99,837.50
GRAYSON PAPA	(PL)	\$ 220.00	12.00	\$ 2,640.00
TOTAL			1,083.85	\$ 439,093.00

Status:

(P) Partner
 (SH) Shareholder
 (OC) Of Counsel
 (SA) Senior Associate
 (A) Associate
 (LC) Law Clerk
 (PL) Paralegal

Please report time in current rates.

EXHIBIT "D1"

EXHIBIT A

**Blue Cross Blue Shield of Michigan
MFN Antitrust Litigation
Lodestar Report**

Firm: Cohen Milstein Sellers & Toll, PLLCReporting Period: Inception through June 30, 2014

Name	Status	Total Hours To Date	Hourly Rate	Total Lodestar To Date
Small, Daniel	P	1,246.00	\$795	\$ 922,252.50
Dominguez John	P	1.25	\$675	\$ 762.50
Brown, Benjamin, D.	P	64.75	\$665	\$ 34,672.50
Konopka, Kathleen	OC	5.00	\$560	\$ 2,520.00
Cormier, Christopher, J.	P	0.25	\$605	\$ 118.75
Johnson, Brent	P	1,460.75	\$595	\$ 774,396.25
Alicia Gutierrez	CA	84.50	\$420	\$ 35,490.00
Ossakow, Ian	CA	382.50	\$415	\$ 158,737.50
Alexander, Laura	A	26.00	\$475	\$ 10,340.00
Levens, Emmy	A	1.00	\$475	\$ 395.00
Dubner, Jeff	A	39.50	\$440	\$ 17,380.00
Clarke, Suzanne	I	1.50	\$420	\$ 615.00
Gebrewold, Besrat	A	90.25	\$395	\$ 38,325.00
Benner, David	A	358.50	\$390	\$ 136,230.00
Tran, Ngan	CA	754.75	\$350	\$ 264,162.50
Boone, Meghan	A	1,787.25	\$415	\$ 633,586.25
Cacace, Robert	A	525.25	\$370	\$ 183,193.75
Bush Veltre, Brenna	A	901.00	\$310	\$ 271,170.00
Fu, Abigail	PL	0.50	\$250	\$ 120.00
Prince, Joshua	A	2.00	\$330	\$ 617.50
Schmitz, Aaron	A	82.25	\$335	\$ 26,731.25
Oak, Lindsay	CA	336.00	\$260	\$ 87,360.00
Ayyagari, Srinivas	CA	154.25	\$290	\$ 44,732.50
Pavesner, Seth	CA	507.00	\$290	\$ 147,030.00
Barevadia, Zarna	T	1.75	\$275	\$ 481.25
Westerman, Jessica	LC	19.50	\$250	\$ 4,875.00
Watson, Brett	LC	8.50	\$250	\$ 2,040.00
Peterson, Brenda	PL	11.75	\$250	\$ 2,878.75
Hanson, Clara	PL	0.50	\$250	\$ 122.50
Twigg, Andrew	PL	11.50	\$250	\$ 2,828.75
Cooke, William	PL	555.50	\$250	\$ 135,761.25
Abetti, Jonathan	PL	242.00	\$250	\$ 59,872.50
Wong, Debra	PL	5.50	\$250	\$ 1,308.75
Wentworth, Ariel	PL	22.00	\$250	\$ 6,401.25
TOTAL		9,690.50		\$ 4,007,513.75

EXHIBIT 11

THE SHANE GROUP, INC., et al., v. BLUE CROSS BLUE SHIELD OF MICHIGAN Case No. 10-cv-14360 Time and Lodestar Summary					
Firm Name	SOMMERS SCHWARTZ, P.C.				
Time Period	Inception through June 30, 2014				
Name	Status	Hourly Rate	Total Hours	Total Lodestar	
Jason J. Thompson	(P)	\$565.00	580.35	\$	327,898.00
Lance C. Young	(P)	\$565.00	541.60	\$	306,004.00
Lisa Mikalonis	(P)	\$530.00	36.10	\$	19,133.00
Andrew Kochanowski	(P)	\$550.00	5.00	\$	4,125.00
Jesse Young	(A)	\$265.00	1.30	\$	347.50
Krista Taylor	(A)	\$315.00	4.50	\$	1,125.00
Debbie Nichols	(PL)	\$100.00	13.10	\$	1,310.00
Tiffany R. Ellis	(LC)	\$250.00	52.00	\$	13,000.00
Mary Serpento		\$75.00	0.30	\$	22.50
TOTAL			1,234.25	\$	672,965.00
Status:	Please report time in current rates.				
(P) Partner					
(OC) Of Counsel					
(SA) Senior Associate					
(A) Associate					
(LC) Law Clerk					
(PL) Paralegal					

